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NO. 25075 EQUITY

FRED R. McCRUMB, JR.

IN THE

Plaintiff

CIRCUIT COURT

vs.

FOR

GLORIA E. McCRUMB

FREDERICK COUNTY

Defendant

ANSWER OF DEFENDANT TO BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Answer of Gloria E. McCrumb, Defendant, by James Willard Davis and Dulany and Davis, her attorneys, to the Bill of Complaint of Fred R. McCrumb, Jr., Plaintiff, respectfully represents:

- 1. That she admits the allegations of paragraph No. 1 of the Bill of Complaint.
- That she admits the allegations of paragraph No.
 of the Bill of Complaint.
- 3. That she admits the allegations of paragraph No. 3 of the Bill of Complaint.
- 4. That she admits the allegations of paragraph No. 4 of the Bill of Complaint.
- 5. That Defendant admits that she has not made any contribution towards the mortgage payments or real estate taxes due on the 25.101 acres of land in Frederick County since October 31, 1970, and that she is without knowledge as to the remaining allegations and therefore can neither admit nor deny the remainder of the allegations set forth in paragraph No. 5 of the Bill of Complaint; and further answering that Plaintiff, Fred R. McCrumb, Jr., has continued to reside in and to enjoy the sole use of the subject property since October 31, 1970, and has made no accounting to Defendant, Gloria E. McCrumb, for rental due her for his exclusive use and enjoyment of her one-half interest in said property.
- 6. That she admits the allegations of paragraph No. 6 of the Bill of Complaint.

WHEREFORE, Defendant prays the following relief from this Honorable Court, to wit:

ENTERNATION OF THE PROPERTY OF

(a) That this Honorable Court issue a Decree appointing Trustees to sell the above-described property, in lieu of